

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

AMANDA VALENZUELA,
aka JANE UTAUS-VA DOE
Plaintiff

vs.

THE UNIVERSITY OF TEXAS
AT AUSTIN
Defendant

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C.A. No. 1:19-cv-01202-RP

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF DEADLINE
TO FILE A MORE DEFINITE STATEMENT**

COMES NOW, Plaintiff AMANDA VALENZUELA (“Amanda”) to file this
“PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO
FILE A MORE DEFINITE STATEMENT” (“Motion”) as follows:

1. On March 24, 2020, this Court entered its Order (*ECF 6*) instructing Plaintiff to file a more definite statement (as to Plaintiff’s Original Complaint) by April 7, 2020 (“Deadline”).
2. Plaintiff now respectfully requests that the Deadline for Plaintiff to file a more definite statement be extended for fourteen (14) days, being to April 21, 2020, due to the medical emergency described hereafter.

3. Since mid-February 2020, counsel for Plaintiff has been tending to unforeseen medical events of counsel's daughter in Dallas (a single mother) related to a recent diagnosis of breast cancer.

4. Counsel for Plaintiff has been involved with:

a. Having initially been diagnosed with a relatively non-invasive form of breast cancer (an oxymoron), the treating oncologist ordered an additional MRI, CAT Scan, Bone Scan, and genetic testing (my daughter was adopted from Russia and the genetic testing was required to try and understand why such a young, healthy woman of 26 would even have the form of cancer identified), which did identify genetic markers from East Europe which created the cancer;

b. Based on the updated results, my daughter's cancer has now been re-diagnosed as being far more evasive and triple in size than as shown in the original mammogram and biopsy; and

c. Such change in diagnosis has greatly altered the initial treatment plan, with my daughter now being scheduled for certain surgical procedures. Prior to such surgery, an aggressive form of Chemotherapy has begun.

5. Counsel for Plaintiff is a primary caregiver of his daughter and grandson and has relocated to Dallas for the rest of 2020.

6. Counsel for Plaintiff has now established a routine (with his daughter and grandson) allowing counsel to tend to his pending matters. However, the foregoing has caused a delay in completing various matters.

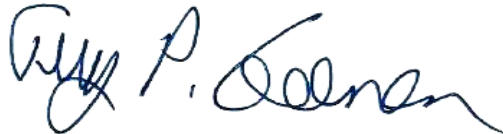
7. Plaintiff, therefore, respectfully seeks an extension of fourteen (14) days as to the Deadline which will allow sufficient time to prepare the more definite statement in accordance with this Court's Order.

8. Plaintiff's request is being made not for delay, but so that justice may be done.

WHEREFORE, Plaintiff respectfully requests that the Court grant this Motion for a fourteen (14) day extension of the Deadline and enter an order extending the Deadline for Plaintiff to file a more definite statement to April 21, 2020

Respectfully submitted,

Gorman Law Firm, pllc



By: _____

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ATTORNEYS FOR PLAINTIFF

AMANDA VALENZUELA

CERTIFICATE OF CONFERENCE

The undersigned certifies that on the 5th day of April 2020, I communicated with counsel for Defendant as to the foregoing request for relief, and Defendant does not object to the relief requested.



TERRY P. GORMAN

CERTIFICATE OF SERVICE

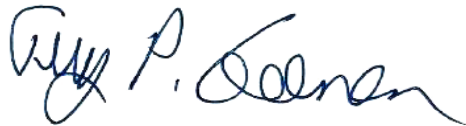
This is to certify that on the 7th day of April 2020, a true and correct copy of the above and foregoing was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure utilizing the *VIA CM/ECF* filing system being:

SUMMER R. LEE

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ATTORNEYS FOR DEFENDANT

THE UNIVERSITY OF TEXAS AT AUSTIN



By:

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